

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

---

)  
LG. PHILIPS LCD CO., LTD., )  
                                )  
Plaintiff,                   ) C.A. No. 05-292 (JJF)  
                                )  
v.                             )  
                                )  
TATUNG COMPANY,             )  
TATUNG COMPANY OF AMERICA, INC., )  
CHUNGHWA PICTURE TUBES, LTD.,     )  
AND VIEWSONIC CORPORATION,        )  
                                )  
Defendants.                    )  
                                )

---

**DEFENDANTS' PROPOSED VERDICT FORM**

OF COUNSEL:  
Teresa M. Corbin  
Glenn W. Rhodes  
Howrey LLP  
525 Market Street, Suite 3600  
San Francisco, California 94105  
(415) 848-4900

Julie S. Gabler  
Howrey LLP  
550 South Hope Street, Suite 1100  
Los Angeles, California 90071  
(213) 892-1800

Robert W. Whetzel (#2288)  
whetzel@rlf.com  
Steven J. Fineman (#4025)  
fineman@rlf.com  
Matthew W. King (#4566)  
king@rlf.com  
Richards, Layton & Finger  
One Rodney Square, P.O. Box 551  
Wilmington, DE 19899  
(302) 651-7700  
Attorneys for Defendants/Counterclaimants  
Tatung Company, Tatung Company of  
America, Chunghwa Picture Tubes, Ltd, and  
Viewsonic Corporation

Dated: July 19, 2006

## I. INFRINGEMENT

*Note:*

Question 1 and 2 relate to literal infringement and infringement under the doctrine of equivalents, respectively, of CPT LCD modules using only outer guard rings.

Questions 3 and 4 relate to literal infringement and infringement under the doctrine of equivalents, respectively of CPT LCD modules using both inner and outer guard rings.

### QUESTION 1:

Do you find that LPL has proven by a preponderance of the evidence that CPT's LCD modules using outer guard rings literally infringe the '002 patent? Please answer "Yes" or "No" for each step.

Claim	Element	Is there infringement? (write "Yes" or "No")
1	A method of manufacturing active matrix display backplanes and displays therefrom, comprising:	
	• providing a substrate;	
	• forming a pattern of pixels on said substrate;	
	• forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said row lines to one another and substantially all of said column lines to one another;	
	• forming an outer electrostatic discharge guard ring on said substrate coupled to said interconnected row and column lines via a resistance to provide protection from electrostatic discharges between said row and column activation lines during manufacture of the displays; and	
	• removing said outer guard ring and row and column interconnections prior to completion of the display.	

**QUESTION 2:**

Do you find that LPL has proven by a preponderance of the evidence that CPT's LCD modules using outer guard rings infringe Claim 1 or Claim 8 under the doctrine of equivalents?

For each claim step listed below, answer whether you find that the methods used to manufacture CPT's LCD modules perform substantially the same function, in substantially the same way to produce substantially the same result.

Claim	Element	Same function (yes or no)	Same way (yes or no)	Same result (yes or no)
1	<p>A method of manufacturing active matrix display backplanes and displays therefrom, comprising:</p> <ul style="list-style-type: none"> <li>• providing a substrate;</li> <li>• forming a pattern of pixels on said substrate;</li> <li>• forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said row lines to one another and substantially all of said column lines to one another;</li> <li>• forming an outer electrostatic discharge guard ring on said substrate coupled to said interconnected row and column lines via a resistance to provide protection from electrostatic discharges between said row and column activation lines during manufacture of the displays; and</li> <li>• removing said outer guard ring and row and column interconnections prior to completion of the display.</li> </ul>			

**QUESTION 3:**

Do you find that LPL has proven by a preponderance of the evidence that CPT's LCD modules using both inner and outer guard rings literally infringe the '002 patent? Please answer "Yes" or "No" for each step.

Claim	Claims Steps	Is there infringement? (write "Yes" or "No")
1	A method of manufacturing active matrix display backplanes and displays therefrom, comprising:	
	• providing a substrate;	
	• forming a pattern of pixels on said substrate;	
	• forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said row lines to one another and substantially all of said column lines to one another;	
	• forming an outer electrostatic discharge guard ring on said substrate coupled to said interconnected row and column lines via a resistance to provide protection from electrostatic discharges between said row and column activation lines during manufacture of the displays; and	
	• removing said outer guard ring and row and column interconnections prior to completion of the display.	
8	The method as defined in claim 1 including forming an inner electrostatic discharge guard ring on said substrate coupled to said row and column lines via shunt switching elements to provide protection from electrostatic discharges between said row and column activation lines during manufacture of the displays and thereafter.	

**QUESTION 4:**

Do you find that LPL has proven by a preponderance of the evidence that CPT's LCD modules using both inner and outer guard rings infringe Claim 1 or Claim 8 under the doctrine of equivalents?

For each claim step listed below, answer whether you find that the methods used to manufacture CPT's LCD modules perform substantially the same function, in substantially the same way to produce substantially the same result.

Claim	Element	Same function (yes or no)	Same way (yes or no)	Same result (yes or no)
1	A method of manufacturing active matrix display backplanes and displays therefrom, comprising:			
	• providing a substrate;			
	• forming a pattern of pixels on said substrate;			
	• forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said row lines to one another and substantially all of said column lines to one another;			
	• forming an outer electrostatic discharge guard ring on said substrate coupled to said interconnected row and column lines via a resistance to provide protection from electrostatic discharges between said row and column activation lines during manufacture of the displays; and			
	• removing said outer guard ring and row and column interconnections prior to completion of the display.			
8	The method as defined in claim 1 including forming an inner electrostatic discharge guard ring on said substrate coupled to said row and column lines via shunt switching elements to provide protection from electrostatic discharges between said row and column activation lines during manufacture of the displays and thereafter.			

IF YOU HAVE FOUND INFRINGEMENT FOR EVERY STEP OF ANY CLAIM IN ANY OF QUESTIONS 1 THROUGH 4, THEN PROCEED TO QUESTION NO. 5.

OTHERWISE, PLEASE SKIP TO QUESTION NO. 13

**QUESTION 5:**

Do you find by a preponderance of the evidence that CPT imports into the United States or offers to sell, sells, or uses within the United States any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes                         No       

**QUESTION 6:**

Do you find by a preponderance of the evidence that CPT has actively induced Tatung Co., Tatung Co. of America, or ViewSonic Corp. to import into the United States or offer to sell, sell, or use within the United States, any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes                         No       

**QUESTION 7:**

Do you find by a preponderance of the evidence that Tatung Co. imports into the United States or offers to sell, sells, or uses within the United States, any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes                         No       

**QUESTION 8:**

Do you find by a preponderance of the evidence that Tatung Co. has actively induced CPT, Tataung Co. of America, or ViewSonic Corp. to import into the United States or offer to sell,

sell, or use within the United States, any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes        No       

**QUESTION 9:**

Do you find by a preponderance of the evidence that Tatung Co. of America imports into the United States or offers to sell, sells, or uses within the United States, any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes        No       

**QUESTION 10:**

Do you find by a preponderance of the evidence that Tatung Co. of America has actively induced CPT, Tatung, or ViewSonic Corp. to import into the United States or offer to sell, sell, or use within the United States, any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes        No       

**QUESTION 11:**

Do you find by a preponderance of the evidence that ViewSonic Corp. imports into the United States or offers to sell, sells, or uses within the United States, any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes        No

**QUESTION 12:**

Do you find by a preponderance of the evidence that ViewSonic Corp. has actively induced CPT, Tatung Co., or Tatung Co. of America to import into the United States or offer to sell, sell, or use within the United States, any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes        No       

PROCEED TO QUESTIONS 13-15.

## II. INVALIDITY

### QUESTION 13

Do you find that LPL has proven by clear and convincing evidence that Scott Holmberg conceived of the invention claimed in Claim 1 and Claim 8 of the '002 patent prior to the filing date of the patent, July 12, 1988?

Yes             No       

If yes, what date of conception has LPL proven by clear and convincing evidence?

---

### QUESTION 14:

Have the Defendants proven by clear and convincing evidence that any of the claims of the '002 patent are invalid by anticipation?

Claim 1                  Yes             No       

Claim 8                  Yes             No       

### QUESTION 15:

Have the Defendants proven by clear and convincing evidence that any of the claims of the '002 patent are invalid for obviousness?

Claim 1                  Yes             No       

Claim 8                  Yes             No

IF YOU HAVE FOUND CLAIM 1 OR CLAIM 8 VALID AND INFRINGED,  
PROCEED TO QUESTION 16.

OTHERWISE, GO TO QUESTION 19.

### III. DAMAGES

#### QUESTION 16

Pursuant to the court's instruction on actual notice, please mark the date you find that LPL has proven by a preponderance of the evidence that LPL affirmatively provided Defendants with actual notice that they allegedly infringed the '002 patent.

February 8, 2002: Yes        No       

May 13, 2005: Yes        No       

#### QUESTION 17:

Based on the date selected in QUESTION 16 – without any considerations of willfulness or prejudgment interest, which is a separate issue for the judge – if you find that LPL has proven by a preponderance of the evidence that Defendants infringe a valid claim of the '002 patent, what sum of money would fairly and adequately compensate LPL?

Answer: \_\_\_\_\_

**QUESTION 18:**

Do you find that LPL has proven by clear and convincing evidence that any Defendant's infringement of the claims of the patent in suit was willful? Answer "yes" or "no" for each defendant below:

Chunghwa Picture Tubes Yes \_\_\_\_\_ No \_\_\_\_\_

Tatung Company Yes \_\_\_\_\_ No \_\_\_\_\_

Tatung Co. of America Yes \_\_\_\_\_ No \_\_\_\_\_

ViewSonic Corporation Yes \_\_\_\_\_ No \_\_\_\_\_

**IV. EXCEPTIONAL CASE**

**QUESTION 19:**

If you have found that there is no infringement of any valid claim, is this an exceptional case that merits awarding the Defendants their attorneys' fees?

Answer: \_\_\_\_\_

THE JURY FOREPERSON SHOULD THEN SIGN AND DATE THE VERDICT FORM AND RETURN IT TO THE SECURITY OFFICER.

Signed this \_\_\_\_ day of July, 2006

---

Jury Foreperson

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 19, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to, and also hand delivered same to:

Richard D. Kirk, Esquire  
The Bayard Firm  
222 Delaware Avenue, Suite 900  
Wilmington, DE 19899

I HEREBY CERTIFY that on July 19, 2006, I sent the foregoing document by Electronic Mail to the following non-registered participants:

Gaspare J. Bono, Esquire  
Matthew T. Bailey, Esquire  
Andrew J. Park, Esquire  
Adrian Mollo, Esquire  
McKenna Long & Aldridge LLP  
1900 K Street, NW  
Washington, DC 20006



\_\_\_\_\_  
Steven J. Fineman (#4025)  
fineman@rlf.com  
Richards, Layton & Finger  
One Rodney Square  
PO Box 551  
Wilmington, DE 19899